

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
2 A Limited Liability Partnership  
3 Including Professional Corporations  
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13 Counsel for Creditor, Citigroup Financial  
14 Products Inc.

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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

13 In re: Case No. 19-30088 (DM)

14 PG&E Corporation Chapter 11

15 -and- (Lead Case)

16 Pacific Gas and Electric Company, (Jointly Administered)

17 Debtors

18  Affects PG&E Corporation  
19  Affects Pacific Gas and Electric  
20 Company  
21  Affects Both Debtors

22 \* All papers shall be filed in the Lead  
Case, No. 19-30088

**NOTICE OF CONTINUED  
PERFECTION OF LIEN PURSUANT  
TO 11 U.S.C. § 546(b)(2)**

1 Citigroup Financial Products Inc. (“Citigroup”), as assignee of Campos EPC, LLC  
2 (“Campos”), by and through its undersigned counsel, hereby gives notice of continued  
3 perfection of its mechanics lien under 11 U.S.C. § 54(b)(2), as follows:

4 1. Campos is a counterparty to certain contracts, work orders, and related  
5 agreements (the “Agreements”) for engineering design and construction work related to  
6 Pacific Gas and Electric Company’s utility services in California. Pursuant to work  
7 performed by Campos pursuant to the Agreements, Campos is owed no less than  
8 \$84,275.10 plus applicable interest.

9 2. Pacific Gas and Electric Company (the “Debtor”) filed a voluntary petition  
10 for relief under Chapter 11 of the Bankruptcy Code on January 29, 2019 (the “Petition  
11 Date”).

12 3. Campos properly perfected its mechanics lien under California Civil Code §§  
13 8400, *et. seq.* by timely recording its Mechanics Lien (Claim of Lien) in the Official  
14 Records of San Benito County on March 27, 2019, as more fully described in its  
15 Mechanics Lien, a true copy of which attached hereto as **Exhibit A**.

16 4. Pursuant to California Code § 8460, an action to enforce a lien must be  
17 commenced within 90 days after recordation of the claim of lien. However, due to the  
18 automatic stay set forth in 11 U.S.C. § 362, Citigroup is precluded from filing a state court  
19 action to enforce the mechanics lien. Pursuant to 11 U.S.C. 546(b)(2), when applicable law  
20 requires seizure of property or commencement of an action to perfect, maintain, or  
21 continue the perfection of an interest in property, and the property has not been seized or  
22 an action has not been commenced before the bankruptcy petition date, then the claimant  
23 shall instead give notice within the time fixed by law for seizing the property or  
24 commencing an action.

25 5. Accordingly, Citigroup hereby provides notice of its right as a perfected lien  
26 holder pursuant to California’s mechanics lien law.

27 6. This Notice shall not be construed as an admission that such filing is  
28 required or to the necessity of recording, commencement or seizure. Additionally,

1 Citigroup gives notice that it has, or may be entitled to, additional mechanics' liens rights  
2 to properties owned by the Debtor as they become due and owing according to prepetition  
3 contracts with the Debtor for improvements of real property. This Notice shall preserve  
4 and continue to preserved any and all of Citigroup's rights as to the Bankruptcy Code and  
5 the California Civil Code.

6        7.        Citigroup expressly reserves its right to seek relief from the automatic stay to  
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foreclose the mechanics lien and/or a waiver of any other rights or defenses. Citigroup  
further reserves the right to amend or supplement this notice.

10 || Dated: June 13, 2019

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By /s/ Michael Lauter  
ORI KATZ  
MICHAEL LAUTER

Counsel for Citigroup Financial Products Inc.

1                   **EXHIBIT A**  
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Recording requested by (name):

Robert Cohen

When recorded, mail to (name and address):

Robert Cohen

1401 Blake Street

Denver, CO 80202

2019-0002259

Recorded  
Official Records  
County of  
San Benito  
JOE PAUL GONZALEZ  
Clerk-Auditor-Recorder

REC FEE 30.00

CONFORMED C 2.00  
SB2 / Affa 75.00

CG  
Page 1 of 6

09:21AM 27-Mar-2019

Recorder's Use Only

## CLAIM OF MECHANICS LIEN

(Cal. Civ. Code § 8416)

### Declaration of Exemption From Gov't Code § 27388.1 Fee

Transfer is exempt from fee per GC § 27388.1(a)(2):  
 recorded concurrently "in connection with" transfer subject to DTT  
 recorded concurrently "in connection with" a transfer of residential dwelling to an owner-occupier  
 Transfer is exempt from fee per GC 27388.1(a)(1):  
 Fee cap of \$225.00 reached  Not related to real property

1. Campos EPC, LLC, a Colorado limited liability company ("claimant") claims a mechanics lien for the labor or services or equipment or materials described in paragraph 2, furnished for a work of improvement on that certain real property located in the County of San Benito, State of California, and more particularly described as (address and/or sufficient description):

PG&E Asset Wright Road District Reg. The site is currently situated on Wright Rd in Hollister, CA. The closest road intersection is Wright Rd and Buena Vista Rd. It receives gas from Hollister Meter Station, and directs gas to Anzar Tap Station. The location coordinates are: Latitude: N 36°51'52.48", Longitude: W 121°26'33.67". The existing valves for L301A are on the east side of the road, and are enclosed by bollards. The west side of the street has a district regulation station that is fed by L-301A and L-301G. The station enclosed by a metal fence. There is also well head equipment behind the fenced area that is connected to the station, but not owned by PG&E.

PG&E Asset Gas Transmission Line L-300 mile point 410.73 Valve MLV 410.87B located on L-300 at Mile point 410.73.

2. After deducting all just credits and offsets, the sum of \$ 84,275.10, together with interest at the rate of 5.25% per annum from March 22, 2019 (date when balance became due), is due claimant for the following labor, materials, services, or equipment: See Attachment A

3. Claimant furnished the labor or services or equipment or materials, at the request of Pacific Gas and Electric Company, (employer, person, or entity to whom labor, materials, services, or equipment were furnished).

4. The name and address of the owner or reputed owner of the real property is/are: \_\_\_\_\_  
Pacific Gas and Electric Company, P.O. Box 997300, Sacramento, CA 95899-7300

5. Claimant's address is \_\_\_\_\_Campos EPC, LLC, 1401 Blake Street, Denver, CO 80202

Dated 3/11/2019



(Signature) Robert Cohen

**VERIFICATION**

I, Robert Cohen, am the: partner of claimant on the foregoing claim of mechanics lien and am authorized to make this verification for and on its behalf. I have read the foregoing claim of mechanics lien and know the contents of the claim of mechanics lien to be true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated 3/8/2019

  
(Signature) \_\_\_\_\_  
Robert Cohen

## ATTACHMENT A

### DESCRIPTION OF WORK / SERVICES PERFORMED

Provided engineering, and materials, equipment, and labor for engineering, procurement and construction of valve automation at the locations noted in Section 2.

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**NOTICE OF MECHANICS LIEN CLAIM**  
**ATTENTION!**

**Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.**

**The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.**

**BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS' STATE LICENSE BOARD WEB SITE AT [www.csrb.ca.gov](http://www.csrb.ca.gov).**

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**PROOF OF SERVICE AFFIDAVIT**  
**California Civil Code section 8416**

Failure to serve the Mechanic's Lien and Notice of Mechanic's Lien on the owner, or alternatively if the owner cannot be served on the lender or direct contractor, shall cause the Mechanic's Lien to be unenforceable as a matter of law (Civil Code Section 8024(d)). Service of the Mechanic's Lien and Notice of Mechanic's Lien must be by (1) registered mail, (2) certified mail, or (3) first-class mail evidenced by a certificate of mailing, postage prepaid, and to a residence or business address for the owner, lender or contractor. Further, a Proof of Service Affidavit (below) must be completed and signed by the person serving the Mechanic's Lien and Notice of Mechanic's Lien. This page should be completed (either one of the sections below) and recorded with the County Recorder along with the Mechanic's Lien and Notice of Mechanic's Lien.

**PROOF OF SERVICE AFFIDAVIT (ON OWNER)**  
**California Civil Code section 8416(a)(7) and (c)(1)**

I, Robert Cohen (name), declare that I served a copy of this Mechanic's Lien and Notice of Mechanic's Lien by registered mail, certified mail, or first-class mail evidenced by a certificate of mailing, postage prepaid, addressed as follows to the owner(s) or reputed owner(s) of the property:

Company/Person Served: PG&E / Linda Y.H. Cheng

Title or capacity of person served (if appropriate): Registered Agent

Service address: 77 Beale Street, 24<sup>th</sup> floor, San Francisco CA 94105. Said service address is the owner's residence, place of business, or address showed by the building permit on file with the permitting authority for the work.

Executed on March 11, 20 19 (date) at San Ramon (city), Costa County (county), California.

Robert Cohen

By: 

(Signature of person making service)

**ALTERNATE PROOF OF SERVICE AFFIDAVIT (ON LENDER OR DIRECT CONTRACTOR)**

**California Civil Code Section 8416(a)(7) and (c)(2)**

I, \_\_\_\_\_ (name), declare that the owner or reputed owner cannot be served with a copy of this Mechanic's Lien and Notice of Mechanic's Lien by registered mail, certified mail, or first-class mail. Pursuant to California civil Code section 8416(c)(2), I served a copy of this Mechanic's Lien and Notice of Mechanic's Lien by registered mail, certified mail, or first-class mail evidenced by a certificate of mailing, postage prepaid, addressed as follows to the construction lender or direct contractor as follows:

Company/Person Served: \_\_\_\_\_

Title or capacity of person served (if appropriate): \_\_\_\_\_

Service address: \_\_\_\_\_

Executed on \_\_\_\_\_, 20 \_\_\_\_\_ (date) at \_\_\_\_\_ (city),  
(county), California.

By: \_\_\_\_\_

(Signature of person making service)